



RECORD OF PROCESSING ACTIVITIES

Record of processing activities with administrative personal data based on Article 31 of Regulation 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies applicable to Europol in accordance with Article 46 of the Europol Regulation

Part I – Public Information

Q1	Last Update of the record	15/02/2021
Q2	Reference number	EDOC #1135582
Q3	Data controller <i>Contact details</i>	Head of Human Resources Unit <i>HeadofHR@europol.europa.eu</i>
Q4	Data Processor <i>(if applicable)</i> <i>Contact details</i>	Eurofins/Salux SCAL laboratories Postbus 16080 2301 GB Leiden
Q5	Joint controller <i>(if applicable)</i> <i>Contact details</i>	
Q6	Data Protection Officer	<i>dpo@europol.europa.eu</i>
Q7	Name of processing activity	Covid-19 testing by external provider
Q8	Purpose of processing	Processing of (medical) data relating to health in order to establish if the data subject is infected with SARS-CoV-2 virus, causing COVID-19. The medical data involved consists of a positive or negative PCR test result only.
Q9	Data categories	<input checked="" type="checkbox"/> Name <input type="checkbox"/> Address <input checked="" type="checkbox"/> Date of birth, <input type="checkbox"/> Place of birth <input type="checkbox"/> ID/ passport no. <input type="checkbox"/> Marital status <input type="checkbox"/> Gender <input checked="" type="checkbox"/> Email address <input type="checkbox"/> Phone no. <input checked="" type="checkbox"/> Name employer <input type="checkbox"/> Personnel number <input type="checkbox"/> Function Other (please, specify): Data subject may receive the outcome of a negative PCR test result via email or telephone number. Positive test results are

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		accessible by the Europol Company Doctor only.
Q10	Description of categories of persons	<input checked="" type="checkbox"/> Europol - All Staff <input type="checkbox"/> Europol - Contractors <input type="checkbox"/> Europol - Law Enforcement Officers <input type="checkbox"/> Europol - Liaison Officers <input checked="" type="checkbox"/> Europol - Seconded National Experts <input type="checkbox"/> Europol - Task Force Officers <input type="checkbox"/> Europol - Trainees & Interns <input type="checkbox"/> Others
Q11	Time limit for keeping the data	The results will be stored for a period of 10 years, to ensure proportionality and align with the Dutch retention policy.
Q12	Recipients of the data	<p>Eurofins/Salux SCAL laboratories, Postbus 16080, 2301 GB Leiden</p> <p>SCAL may subcontract third parties to provide their services. When third parties are subcontracted for this purpose, SCAL takes the required contractual and organisational measures required to ensure that data is processed in accordance with the GDPR and national laws.</p> <p>A positive Covid-19 infection needs to be reported to the Dutch GGD by SCAL in line with the Dutch Law on Public Health¹</p>
Q13	Transfer to third countries or international organisations	<input checked="" type="checkbox"/> NO <input type="checkbox"/> YES: Name third party I: Place of third party: Contact details: Legal basis transmission: Does the recipient processes data on behalf of Europol <input type="checkbox"/> Yes <input type="checkbox"/> No Safeguards established:
Q14	General description of security measures	<p>The data subject and/or the Europol Medical Service indicate that a Covid-19 test may be required to ascertain whether a person is infected.</p> <p>Europol Medical Service makes an appointment for the data subject by phone with SCAL and confirms this by e-mail.</p>

¹ Wet publieke gezondheid (Wpg)
<https://wetten.overheid.nl/BWBR0024705/2021-01-09>

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		<p>After performing the Covid-19 test, SCAL transmits the result by secured two step authenticated e-mail to the Europol Medical Service.</p> <p>If the laboratory sends the results of more than one staff member in one attachment, the results are printed and scanned separately.</p> <p>Europol Medical Service informs the data subject of their individual result by internal email.</p> <p>The data is accessible to the Company Doctor and/or Medical Service only. Their workstations are password protected and their offices are locked.</p>
Q15	How data subjects can exercise their rights to access, rectification, object and data portability (where applicable)	<p>Staff have the right to access, rectify, block and erase their personal data via a written request to the data controller.</p> <p>Staff have the right of recourse to the Europol Data Protection Officer (dpo@europol.europa.eu DPO, Eisenhowerlaan 73, 2517 KK, The Hague, NL) and the European Data Protection Supervisor (https://edps.europa.eu/).</p>